

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Demos Demopoulos, Steven Goldman, Michael N.
Romita, John "Jack" Dresch, and Joseph LaForgia
as TRUSTEES of the LOCAL 553 BENEFITS
FUND; and as TRUSTEES of the LOCAL 553
PENSION FUND; and as TRUSTEES of the
LOCAL 553 DEFERRED COMPENSATION FUND,

Plaintiffs,

07-CV-09451 (DC) (MHD)

-against-

MYSTIC TANK LINES CORP.,

Defendant.

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JOINT PROPOSED DISCOVERY PLAN PURSUANT TO FED. R. CIV. PROC. 26(f)

In accordance with Federal Rule of Civil Procedure 26(f), counsel for Plaintiffs, the Trustees of the Local 553 Pension, Benefits, and Deferred Compensation Trust Funds (the "Trustees"), and counsel for Defendant Mystic Tank Lines Corp. ("Mystic") have conferred, and stipulate and agree to the following:

1. The parties shall file their initial disclosures pursuant to Federal Rule of Civil Procedure 26(a) by March 13, 2008.
2. The parties agree that the primary issues that require discovery are: (1) the amount of delinquent contributions owed by Mystic pursuant to remittance reports and/or failure to report and/or pursuant to audit(s); (2) the defenses asserted by Defendant Mystic in its Answer; and (3) the amount of damages sought by Plaintiffs.

3. The parties agree to commence discovery after the Court conference on March 14, 2008.

4. The parties agree to complete discovery by July 31, 2008.

5. The parties see no need to make changes in any of the limitations under the local and federal rules pertaining to discovery.

6. The parties agree that they will have until May 30, 2008 to amend the pleadings, including joinder of parties.

7. The parties agree that dispositive motions, if any, will be initiated by October 3, 2008.

8. The parties agree that the Court will order the parties to file a joint pretrial order upon resolution of the dispositive motions, if any.

Dated: March 11, 2008
New York, New York

March 11, 2008
New York, New York

By: /s/
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